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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

UNIVERSAL NORTH AMERICA  
INSURANCE COMPANY

Plaintiff,

vs.

MATTHEW A. CATHCART, individually;  
CHERYLE T. CATHCART, individually;  
and JOHN DOES 1-100, inclusive, and  
JANE ROES 1-20, inclusive,

Defendants.

Case No. 2:13-cv-01767-RCJ-GWF

**JOINT STIPULATION TO EXTEND THE PARTIES'**  
**INITIAL AND REBUTTAL DISCLOSURE DATES**  
**(First Request)**

COMES NOW the above-captioned parties, by and through their undersigned counsel of record, and hereby stipulate and agree that the initial expert disclosure date of November 23, 2015, may be extended for a period of fourteen (14) days through December 7, 2015, and the rebuttal expert disclosure date of December 22, 2015, may likewise be continued for a period of fourteen (14) days through and including January 5, 2016.

I. This extension is requested to allow the parties time to complete additional discovery which will then be used by their respective efforts in preparing their initial and rebuttal reports.

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1           2. The parties are not requesting any other change to the Scheduling and Discovery  
2 Order proposed by them on September 24, 2015 [Dkt. 77] and approved by this Court on October  
3 1, 2015 [Dkt. 78].

4           3. This is a first request of the parties to modify the initial and rebuttal disclosure dates  
5 and is made in good faith and not merely for the purposes of delay.

6           WHEREFORE, the parties jointly request that this Honorable Court enter an Order  
7 extending the parties' initial expert disclosure date to December 7, 2015, and the rebuttal  
8 disclosure date to January 5, 2016, with all other dates set forth in the Scheduling Order  
9 approved by the Court on October 1, 2015 remaining unchanged.

10           RESPECTFULLY SUBMITTED this 23rd day of November, 2015.

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12           OLSON, CANNON, GORMLEY  
13           ANGULO & STOBERSKI

14           JUDD J. BALMER, ESQ., LTD.

15           BY: /s/ Walter R. Cannon  
16           WALTER R. CANNON, ESQ.  
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19           Attorney for Plaintiff

20           BY: /s/ Judd J. Balmer  
21           JUDD J. BALMER, ESQ.  
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24           Las Vegas, Nevada 89120  
25           Attorney for Defendants

26  
27           IT IS SO ORDERED:

28           

29           GEORGE FOLEY, JR.  
30           United States Magistrate Judge

31           Dated: November 24, 2015